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ABSTRACT

This annual report by the Commission on Higher Education's details progress toward goals and objectives, annual statistics, and key issues in accreditation and quality assurance. A recurring theme of the report and the year it covers is the changing relationship between accrediting agencies and the federal and state governments, specifically in light of the Higher Education Act amendments of 1992. Following an opening message from the executive director, the first section describes executive and professional staff liaison with institutions in a range of campus visits and office meetings related to self-study, evaluation, and the requirements and expectations for applicant and candidate institutions. A section on annual statistics lists institutions receiving candidate status, reaffirmed accreditation, follow-up reports, candidate reports, visits, or other developments. The next four sections discuss information literacy and library support efforts, policy development work, new policy statements on student transfer and articulation, and accreditation of free-standing American institutions abroad. This section also discusses areas for policy work and development in 1994-95. The report includes a description of liaison with external organizations and groups, and workshops, conferences and special events held during 1993-94. A final page lists Commission members and staff. (JB)

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1993–1994

Perspectives and Accomplishments

Annual Report of the Executive Director

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Middle States Association of Colleges and Schools

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From the Executive Director

The primary purpose of the annual report is to summarize the major events relating to the central work of the Commission as embodied in its strategic plan, including the Commission's relations with public and private external bodies.

Unlike my previous annual reports as executive director of the Commission, this one has taken longer to complete because of demands placed upon us by the 75th anniversary celebrations and the fact that the annual report is in the process of being reconceptualized. The need to create a new framework and design for the report grows out of our past success in reporting in the *CHE Letter* ongoing developments within and outside the Middle States region.

Because members of the executive and professional staffs of the Commission devote the majority of their time to interacting and collaborating with member, candidate, applicant, and inquiring institutions, this report begins by addressing the important contributions of staff in implementing the Commission's goals and objectives in academic year 1993–94.

It also includes the annual statistics that previously appeared in the spring issue of the *CHE Letter*. Moreover, since the world of accreditation is expanding to include new alliances and an international context, this report deals with a broad range of issues in accreditation and quality assurance.

As we reflect on the many areas in which the Commission continues to have a vital role, we realize how wonderful it is to have a year in which the focus is on celebrating what is good about the Commission, its constituent institutions, and peer reviewers!

Even though a considerable portion of the Commission's time again was devoted to matters related to the United States Department of Education, the federal government was not preoccupied with the Commission but, rather, with all of higher education and accreditation. In addition, the collaborative manner in which the higher education community addressed its substantive response to the proposed regulations under the reauthorization of the Higher Education Act Amendments was nothing less than heroic. In my 20 years with the Commission, I have not witnessed such organization and cooperation in defending the integrity of our system of voluntary accreditation and peer review.

The passage of the HEA and the adoption of its implementing regulations forever changed the landscape of accreditation and higher education. Given the increased interest of state and federal bureaucracies in creating their own system of accountability, we can expect more, not less, interaction with government in the future.

It will be interesting to await the outcome of the sea of changes in accreditation that began last year. Maybe we were prompted to accelerate reforms that regional accrediting commissions had been considering. And if we are careful not to "throw out the baby with the bath water," we will have spent our time wisely in making a better system for quality assurance in higher education. But one thing is certain, we do not have the liberty of doing nothing to bring about reasonable change.

— Howard L. Simmons, Ph.D.
Executive Director
Midle States Commission on Higher Education

Executive and Professional Staff Liaison with Institutions

The associate directors and I were involved in a range of campus visits and office meetings during academic year 1993–94. It was an especially busy year, with visits to campuses and receiving campus visitors at the Commission office. Our discussions related to self-study and evaluation processes, the requirements and expectations for applicant and candidate institutions, Periodic Review Report procedures, the preparation and submission of a variety of follow-up reports, and a host of other accreditation issues, such as outcomes assessment and planning.

By June 30, 1994, we had completed the following campus visits:

Preparations for Self-Study	63
Follow-up and special visits	60
Small team visits	7

In addition, we conducted 25 office meetings with institutional representatives and participated in 25 Commission and Committee meetings and workshops.

The Commission also was represented by its professional staff at a broad spectrum of regional, national, and international meetings. Included were those of the American Council on Education, the American Association for Higher Education, the American Association of State Colleges and Universities, Western Pennsylvania Consortium for Higher Education, the Association of College and University Presidents of Puerto Rico, the International Association of University Rectors, the Mexican Association of Private Universities, the Society for College and University Planning, the Association of Governing Boards, the American Association of Community Colleges, the American Library Association, the National Forum on Information Literacy, and the Pennsylvania Association of Colleges and Universities.

My work and that of the executive associate directors, administrative associate director, and assistant directors would be much less effective were it not for the expert professional assistance of other members of the administrative and support staffs. Because teamwork and collaboration are important to the fulfillment of the Commission's agenda, this annual report would be incomplete without specific reference to the manner in which each member of the staff contributes to the overall attainment of organizational goals and objectives.

Moreover, with changes in the environment for regional accreditation and voluntary peer review and the resignation of a key member of the staff to pursue another career, it was necessary to reconsider staffing needs in view of significantly changed circumstances. The departure of Assistant Director Alice Schell accelerated our decision to separate the responsibilities for policy development and research from duties related to publications, public relations, and special programs. That Assistant Director Alice Schell was able to handle this wide span of responsibility attested to her value and effective contribution to the work of the Commission. While we applaud her excellent work and unselfish devotion to the maintenance of excellence in Commission initiatives, we welcome the addition of two experienced and well-qualified successors.

The first, Mr. Oswald M.T. Ratteray, is Assistant Director for Constituent Relations and Special Programs, who has primary staff responsibility for all Commission publications; special programs such as workshops,

conferences, and seminars; and external relations. Already Assistant Director Ratteray's skills and expertise are reflected in the improved quality of recently released CHE publications such as the CHE *Directory*, *Candidacy for Accreditation*, *Handbook for Chairing and Hosting*, and *Handbook for Team Members*, among others. Mr. Ratteray currently is preparing for publication revised versions of other Commission publications that must be updated to make them consistent with the most recent approved and published edition of *Characteristics of Excellence in Higher Education*, including the *Handbook for Periodic Review Reports and Reviewer Analysis* and *Designs for Excellence: Handbook for Institutional Self-Study*. At the same time, Mr. Ratteray was designated as the staff coordinator for the broad range of activities related to the celebration of the Commission's 75th Anniversary, including the layout and production of the Commemorative Booklet.

The second, Ms. Mary Beth Kait, is Assistant Director for Policy Development. She has responsibility for the review and development of policy and procedural documents, the preparation of recognition petitions for the United States Department of Education and the Commission on the Recognition of Postsecondary Accreditation, among other policy-related initiatives. She also is expected to conduct a portion of the Commission's research agenda, and to coordinate the Commission's periodic self-study efforts. Ms. Kait's orientation to the work of the Commission has been enhanced through her careful and thorough analysis of Subpart H of the reauthorization of the Higher Education Act regulations, which have been reported in previous issues of the *CHE Letter*.

Administrative Associate Director Robin Dasher-Alston not only contributed generously to the development of the Commission's recently-adopted Three-Year Plan, but she also prepared—under my general direction—the preliminary and final Commission budget documents for FY95. In addition, the updated computer systems plan for the next five years and proposed changes in the content and format of the Annual Institutional Profile largely reflect her efforts and leadership. And until Mr. Ratteray officially began his duties with the Commission, Dr. Dasher-Alston helped coordinate the Commission's 75th anniversary activities, especially the regional celebrations in San German, PR; Washington, DC; Pittsburgh, PA; and Rochester, NY. During 1994–95 she will be engaged in staff development activities which will prepare her for professional field work related to special follow-up visits directed by the Commission. The work of the Administrative Assistants for Evaluation Services and Records Management is encompassed by the responsibilities of Dr. Dasher-Alston.

Administrative Assistant for Evaluation Services Vivian L. Ellis, who is completing her 16th year with the Commission, continues to assure that various institutional self-studies, evaluation reports, Periodic Review reports, follow up reports, and candidacy progress reports are handled efficiently and promptly. During 1993–94 hundreds of such reports were processed through Ms. Ellis' office before being acted upon by the Commission and its Committees. (Please refer to the statistical summary on pages 5–6.)

The preparation of the statistical summary of Commission actions is but one of the duties of Administrative Assistant for Records Management Alan Gold. Implemented for the first time more than three years ago, the Statement of Affiliation Status is also one of Mr. Gold's major responsibilities. The SAS, which accompanies every official Commission action letter and which is made available in its approved form upon request, continues to fulfill in part the Commission's public disclosure responsibility. The focus of Mr. Gold's efforts during 1994–95 will be on the proper storage and retrieval of archives and a review of the Commission's records retention guidelines.

Equally important is the superior manner in which Administrative Assistant for Office Support Services Clara D. Brown arranges for Commission meetings, implements office cost control measures, purchases and maintains inventories of office supplies, as well as keeps up with my constantly changing itinerary! The work of the Commission has been enhanced especially during the past year through her supervision of major office mailings and the preparations for special Commission activities.

Since the Middle States Association decided to leave the position of database manager unfilled, Computer Services Coordinator Wyade A. White has been devoting more of his time assisting members of the staff with hardware and software problems, especially in database and word processing applications. Because of the need to upgrade and replace computer hardware and software, Mr. White worked closely with the then assistant director for planning and information systems (Dr. Robin Dasher-Alston) to develop a proposal for upgrading the Commission's computer capabilities, especially to improve the handling of the Annual Institutional Profile and to facilitate the use of the evaluator and institutional databases for the purpose of constructing evaluation teams.

Partly because of his efforts in providing computer support in laying out the *CHE Letter*, our constituents have noticed an improved newsletter. With the use of additional desktop publishing software under the direction of Assistant Director Ratteray, we can expect even better results in 1994–95!

Occupying the newly created position of Office Associate are veteran staffers Christina L. Lucas and Margaret L. Robbins. Both Ms. Lucas and Ms. Robbins figure prominently in the revised organizational structure that is based on differentiated staffing to accomplish the Commission's goals and objectives. For example, the construction of evaluation teams will be enhanced because these two office associates now have responsibility for working with the executive and associate directors in preparing preliminary and final team rosters, from developing computer lists of team prospects to formatting the final approved roster. Each also has a special role in the logistical support of all workshops, conferences and other special Commission programs. In addition, Ms. Lucas continued this past year her clerical support of the Study Abroad Program evaluations while Ms. Robbins provided support for the Commission's 75th anniversary activities.

Clerk-Typist Carmela R. Morrison, who was promoted to Office Assistant as of July 1, 1994, provides support to Administrative Assistants Vivian L. Ellis and Alan Gold. Her assignment to provide consistent support in processing various documents and records has been a significant factor in improving quality in this area. For the thousands of pages that must be processed annually, we are always seeking the most efficient manner of handling "paper moving" tasks.

Also handling Commission documents from receipt to storage is Clerk Marcus L. Lindsay, who also is the cheerful voice you usually hear on the telephone when calling the Commission office. If anyone deserves an award for efficiently copying and reproducing documents used in the accreditation process, it is Mr. Lindsay. Whether it is the agenda book for Commission meetings or reports for committee meetings or handouts for workshops, Mr. Lindsay usually does the bulk of the work. And in addition to checking in the daily deluge of mail, he is also busily filling publication orders, including a recent order for 1,500 copies of *Characteristics* that a member institution wanted to distribute to its student body! During the last few months alone, he has filled orders for more than 3,000 copies of the revised *Characteristics of Excellence*!

The newest member of the support staff is Office Associate Victoria Clark, who has been designated as the travel coordinator for the Commission. Making this task the task of a single individual now assures that all staff travel can be accomplished more conveniently and at the lowest possible cost.

CHE/MSA Accrediting Activity Annual Statistics

Members of the staff exhibited the highest level of professionalism and cooperation in assuring that the Commission agenda was fulfilled. The statistics below tell only part of the story, especially since our efforts are successful only because of the assistance provided freely by hundreds of peer reviewers. Even after 20 years with the Commission, it still is amazing to me how it is possible to get so many dedicated and qualified volunteers to serve as team chairs, evaluators, periodic review report readers, consultants, observers, and special task force and committee members!

Commission Actions

[As of November 17, 1994]

Candidate for Accreditation Status Granted

National Defense University, DC

Accreditation Reaffirmed via Evaluation Visit

[2 institutions]

Princeton University, NJ
State University of New York at Stony Brook

Accreditation Reaffirmed via Periodic Review Report

[37 institutions]

Audrey Cohen College, NY
Beaver College, PA
Bloomsburg University of Pennsylvania, PA
Burlington County College, NJ
CUNY Bronx Community College, NY
CUNY Brooklyn College, NY
CUNY Graduate School and University Center, NY
CUNY Herbert H. Lehman College, NY
CUNY Queensborough Community College, NY
College of Insurance, NY
Dundalk Community College, MD
Elizabethtown College, PA
Franklin and Marshall College, PA
Georgian Court College, NJ
Hartwick College, NY
Hofstra University, NY
Howard University, DC
Lafayette College, PA
Morgan State University, MD
Nyack College, NY
Onondaga Community College, NY
Pace University, NY
Point Park College, PA
Rowan College of New Jersey, NJ
Saint Francis College, NY
Schenectady County Community College, NY
Shippensburg University of Pennsylvania, PA
SUNY Health Science Center at Syracuse, NY
Temple University, PA
Towson State University, MD
Trocaire College, NY
Union Theological Seminary, NY
UPR Humacao University College, PR
Ursinus College, PA
Vassar College, NY
Washington and Jefferson College, PA
Wilson College, PA

Accreditation Reaffirmed via Follow-up

[2 institutions]

American University in Cairo, NY
Polytechnic University, NY

Follow-up Reports/Candidate Reports/ Visits/Developments

[59 institutions]

[(*) Reference to these institutions appears more than once in the Summary of Actions. Reports and/or visits were required prior to CHE action.]

Adelphi University, NY
Albany College of Pharmacy of Union University, NY
*American University in Cairo
Bank Street College of Education, NY
Bowie State University, MD
Bucks County Community College, PA

Butler County Community College, PA
Caribbean University, PR
*Cazenovia College, NY
*Central Pennsylvania Business School, PA
CUNY John Jay College of Criminal Justice, NY
Clarion University of Pennsylvania, PA
College of Aeronautics, NY
College Misericordia, PA
College of Mount Saint Vincent, NY
Community College of Allegheny County–Boyce Campus, PA
Community College of Allegheny County–South Campus, PA
*Community College of Beaver County, PA
Community College of Philadelphia, PA
Corcoran School of Art, DC
Delaware Valley College of Science & Agriculture, PA
Eastern College, PA
Essex Community College, MD
Goldey-Beacom College, DE
Inter American University of Puerto Rico–Bayamon Campus
Inter American University of Puerto Rico–Metropolitan Campus
Iona College, NY
Jewish Theological Seminary of America, NY
Joint Military Intelligence College, DC
Keystone Junior College, PA
The King's College, NY
Le Moyne College, NY
Lutheran Theological Seminary, PA
Maryland College of Art and Design, MD
Medaille College, NY
Molloy College, NY
Montgomery College - Germantown Campus, MD
Montgomery College - Rockville Campus, MD
Montgomery College - Takoma Park Campus, MD
Moore College of Art and Design, PA
*National Defense University, DC
Orange County Community College, NY
Paul Smith's College, NY
Philadelphia College of Pharmacy and Science, PA
Pittsburgh Theological Seminary, PA
*Polytechnic University, NY
Pontifical Catholic University of Puerto Rico, PR
Regents College of the University of the State of New York, NY
Robert Morris College, PA
Spring Garden College, PA
SUNY College at Brockport, NY
SUNY College at Cortland, NY
SUNY College at Oswego, NY
SUNY College of Optometry, NY
Touro College, NY
University of Puerto Rico–Carolina Regional College, PR
University of the Arts, PA
Upsala College, NJ
Wadhams Hall Seminary/College, NY

Information Literacy: What Progress Are We Making?

In December 1993, Middle States constituents approved a revised edition of *Characteristics of Excellence in Higher Education*, which places new emphasis on the role of libraries in colleges and universities, encouraging institutions to develop effective programs of information literacy as one means of improving undergraduate instruction and student learning outcomes.

I am currently working with Dr. Patricia Senn Breivik, the co-author of *Information Literacy*, to assure that the Commission can develop more useful materials on resource-based learning and can encourage institutions to apply concepts of information literacy to the improvement of undergraduate teaching and learning.

Our first endeavor was to discern the extent to which information literacy was being promoted by colleges and universities. A survey was completed and the results were analyzed to determine what should be the Commission's next course of action to assist institutions in this important area.

While we anticipated that we would develop some form of "hands on" session to identify "good practices" and prepare a state-of-the art paper, external demands related to the reauthorization of the Higher Education Act negotiations and preparations for the Commission's 75th anniversary celebrations made it impossible to accomplish this objective over the last academic year.

The Commission now is collaborating with the National Forum for Information Literacy, the Association for College and Research Libraries, the American Association for Higher Education, and the Senior College Commission of the Western Association of Schools and Colleges to identify state-of-the-art programs in information literacy. The joint efforts of these groups are expected to result in at least two invitational information literacy roundtables in the coming academic year.

Policy Development in High Gear!

The final stage in the review, approval, and dissemination of *Characteristics* was one of the most significant events in policy development during FY95, an event that set the stage for the continuing review of other Commission policies, procedures, and administrative documents.

With the critical input of randomly selected team evaluators and chairs and institutional representatives and the professional coordination of Dr. John Ravekes, an experienced CHE/MSA team chair, the Commission revised and distributed, by the fall of 1995, the following documents: *Handbook for Chairing and Hosting a Middle States Team*, *Handbook for Evaluators*, *Candidacy for Accreditation*, and *Handbook for Periodic Review Reports and Reviewer Analysis*.

The other important milestone in Commission policy development has been a change in the nature and scope of staffing in this critical area. Given the success former Assistant Director Alice Schell achieved in the

unprecedented constituent review of *Characteristics*, it was important for the Commission to recruit the best talent for policy review and analysis to continue the momentum for the equally qualitative review of related Commission documents.

As mentioned elsewhere in this report, new Assistant Director Mary Beth Kait is now coordinating policy development initiatives under my general direction and with the essential collaboration of other members of the professional staff. Though new Assistant Director Oswald M.T. Ratteray is serving primarily as the Commission's publications specialist and special events coordinator, he is already contributing immeasurably to policy revision and editing.

Aside from the major effort realized in the publication of a revised *Characteristics*, major policy reviews were carried out through the diligent work of Commission-appointed task forces: these were the Task Force on Transfer and Articulation and the Task Force on International Issues in Accreditation.

Transfer and Articulation: CHE's newest policy statement

The Commission's Task Force on Transfer and Articulation, coordinated by Associate Director John H. Erickson and chaired by Commission Chair Stephen M. McClain, began work almost two years ago, rendering its final report for first review and approval by the Commission in June 1995.

Because the Commission did not have a comprehensive policy encompassing both transfer and articulation and had not carried out a recent review of its old policy statement on Transfer Students, the Commission decided to make the topics of transfer and articulation high priorities to be addressed in its Three-Year Plan. As the review of *Characteristics* progressed over the last two years it became clear that the Commission needed a more comprehensive policy document that would provide more guidance to member institutions and other affected parties on the subjects of student transfer and institutional articulation.

For this annual report, I asked Associate Director John H. Erickson to develop a brief report on the essential elements of the comprehensive transfer and articulation policy that appeared as a special supplement in the Summer 1994 issue of the *CHE Letter*.

What follows, then, is Dr. Erickson's highly informative summary of the policy's rationale and key issues. It is also one other means used by the Commission to inform constituents of the thrust of the work done by the Task Force on Transfer and Articulation.

Summary of the Policy Statement

In June of 1992 the Commission on Higher Education named a Task Force to explore the issues of transfer and articulation. Among the reasons for this action were: 1) an increased national and public interest in "accountability" issues; 2) an increase in inquiries from individuals and institutions re: any CHE policies or position papers on transfer; 3) a perception that most institutions had limited reliable outcomes data on transfer students; 4) the view that the existing CHE statement on "Transfer Students," last revised in 1984, was inadequate since it dealt primarily with transfer students from unaccredited institutions.

At its initial meeting in March 1993, the Task. Force engaged in extensive brainstorming and discussion of what might be the key issues relative to transfer and articulation. As a result

of its deliberations, the Task Force identified nine key concerns, grouped under these headings: academic issues, procedural issues, and related issues. The nine key concerns included:

Academic Issues

1. academic concerns: curricular and faculty involvement; relevance of good data (performance, etc.)

2. how to define the broad(er) idea of articulation: the (necessary) prior basis of dialogue that leads to articulation agreements

3. general education requirements

Procedural Issues

4. to what extent do institutional policies, services, and practices recognize and act upon different needs & types of transfer students

5. the ongoing need to evaluate, modify, expand, etc. existing transfer policies and articulation agreements

6. the critical role of communications

Related Issues

7. distinctions between public and private sector institutions—and the relevance of applicable state mandates

8. post-secondary vs. higher ed programs and constituencies

9. how to define and deal with non-traditional students and non-traditional learning

These nine issues served as the point of departure for the work of the Task Force, which continued in additional meetings in June 1993 and November 1993. The Task Force initially drafted two documents: a policy statement and a companion position/background paper. Later reflection by the Task Force and CHE administrative staff resulted in the two documents being merged into one, with the policy statement preceding the background discussion.

The Task Force proved to be an excellent forum for discussing shared and divergent points of view. The wide range of sectors and institutional experience represented in the Task Force membership also enhanced this type of exchange. The following key issues, which tended to dominate the Task Force deliberations, reflect its concerns for both the current environment of higher education and larger public interests:

- How can the Commission, the Task Force, and institutions keep a constant and appropriate focus on the *student* who is transferring?
- What is the appropriate balance between faculty responsibility and broader administrative responsibility/initiatives?
- How do we balance student/public interest in controlling time and tuition investment with the need for institutions to maintain and assure academic program integrity?
- How do we emphasize the critical need for effective communication, both in written materials and actual advising of students?
- How do we highlight the need for and encourage dialogue and discussion among faculty and departments, as a foundation for policy development?
- What are the significant distinctions between programs that are primarily vocational/occupational in nature and liberal arts/pre-professional programs?

The policy and position paper received initial review and comment by the Commission on Higher Education during its February 1994 meeting; a revised draft incorporating suggested changes was endorsed by the Task Force and approved by the Commission in June 1994. The document now goes to the constituency for review and final approval at the December 1994 annual meeting.

There are plans to feature the document in a future *CHE Letter*, as well as share the statement with accrediting bodies and other interested parties. It also will be utilized in the upcoming workshops for new team chairs and evaluators.

The Commission expects that the policy statement and position paper developed by the Task Force will provide clarity and guidance on the complex and important issues relating to transfer and articulation.

Accreditation of Free-Standing American Institutions Abroad

Over the past several decades, the Middle States Commission on Higher Education developed a concern for international education as it impinges on accreditation. For example, the Commission fully accredits four free-standing American institutions abroad (down from five a few years ago), beginning chronologically with the American University of Paris, which was accredited in 1973. The others are the American University in Cairo, Franklin College Switzerland, and Richmond College in London.

In some ways, the relationship of these colleges with the Commission has been an anomalous one. For example, at least one never completed the standard period of candidacy. Given the considerable distances and cost of travel, there tends to be much less interaction with institutions abroad and some reluctance on the part of evaluation teams and Commission committees to recommend follow-up visits. The Commission staff seldom "hears" what is going on abroad, which is the major reason for surprise on this side of the Atlantic when we learned, in 1991, that the American College in Switzerland was closing its doors.

The Commission regularly receives inquiries from free-standing colleges abroad regarding accreditation. Although the Commission remains appropriately flexible in dealing with its entire constituency, always keeping the uniqueness of institutional mission in the forefront, the phenomenon of overseas colleges raises special issues. Always present are questions of culture, language, educational experience of students, faculty background and credentials, and institutional accountability. Thus, in 1992 and 1993, the Commission agreed to look carefully at all of the areas involving international education as it relates to accreditation, even such well-established and very successful areas as the evaluation of study abroad programs. The Commission took two major actions: it declared a moratorium on receiving applications from overseas institutions, and it created a special Task Force on Accreditation Issues in International Education.

The Commission was mindful that the concept of accreditation is virtually unknown overseas, and there is a reasonable concern that accreditation is not only misunderstood but is fraudulently advertised abroad. One of the major goals, therefore, was to help protect the reputation of American higher education. As part of this objective, the Commission looked for guidance in monitoring activities of Middle States institutions which have established—or contemplate establishing—branch campuses abroad, particularly in the Pacific Rim, as well as institutions which have entered into contractual relations with non-accredited organizations abroad.

The Task Force was convened in 1993 to review thoroughly existing policy statements and procedural guidelines related to accreditation in international education; to identify the primary issues and questions related to the appropriate role for the Commission as an accrediting body in international education; and to consider the possibility of an alternative structure for accreditation in international education, even to the point of recommending a new or different accrediting body devoted exclusively to international activities.

This last suggestion was very dramatic, particularly in light of the demise of the Council on Postsecondary Education and efforts to create a successor organization that could provide a responsible forum for all accreditation (or at least for the regional accrediting bodies). Accrediting agencies do not have a very good record of cooperation, and a national policy could assure consistency of standards and help avoid "accreditation shopping." A continuing problem certainly would be licensure, since any policy would rest on state chartering and the 50 states vary greatly in their standards and procedures. A national policy, accompanied by a set of procedures for implementation and agreed to by all of the regional accrediting agencies, could mitigate some of that difficulty and, in any case, is greatly to be desired.

From the beginning, the Task Force wondered whether the Commission should be accrediting colleges abroad. Some members argued that the precedent already exists; such accreditation has been extended for more than two decades. Others pointed to the dangers of cultural imperialism and the difficulty of monitoring institutions which are so many thousands of miles away. Moreover, it is probably unrealistic to expect that a college or university in another country, even if it deliberately chooses to use American education as its model, would or should meet all the standards that U.S. agencies set for accreditation. The secondary education from which students come, the jobs they will have in the future, and the governance structure of the institution are all sufficiently different from conditions in the United States that the accreditation standards of the regional accrediting agencies may not all be relevant or applicable. In such cases, exceptions might need to be made or institutions might be forced to abide by standards adopted for different circumstances.

The Task Force attempted to list and analyze the issues:

1. What are the types of institutions that might receive consideration?

   a. Colleges and universities established under American auspices, chartered or licensed in the U.S., with basically American academic curricula and requirements, and/or

   b. Institutions which are not American-based or founded but which offer American curricula and academic programs.

The Task Force recognized that only option *(a)* is feasible, since the Commission is bound by its own charter.

2. What are the criteria that would make an institution eligible for accreditation?

   a. Governance and control. Should institutions be required to have an American board? Should they be chartered or licensed in the host country as well as in the U.S.?

   b. Student body. Must the student body be primarily American? A majority? Should the school primarily serve students of the host country or a mix of American and others?

   c. Faculty. Should American faculty be a majority? Majority American-trained? Should there be a certain percentage with U.S. advanced degrees? No restrictions?

   d. Academic program/facilities. Should the criteria for academic programs be the same as those for stateside institutions? If not, what modifications would be permitted? Must English be the language of instruction?

What should be the criteria for libraries? For student services?

The Task Force responded to these questions by defining an American institution as one that:

— is incorporated in the United States

— is appropriately chartered, licensed, and approved for collegiate/university level, degree-granting purposes

— has an American governing board with a majority of US citizens in its membership operating with policies and procedures consistent with the standards contained in *Characteristics of Excellence in Higher Education* and the CHE policy statement on governing boards

— operates on academic terms and offers courses that are credit-bearing

— has English as the language of instruction

— has a faculty which is predominantly made up of people with substantial experience with American higher education and qualifications equivalent to American graduate degrees.

No restrictions should be placed on the nationality of the student body, which might be international or primarily American.

In addition to these issues, there are several other problem areas that need careful and continuing attention. These are areas which cannot be settled by Commission action, but must be reviewed and monitored as part of any on-going relationship with free-standing institutions overseas and should be codified as part of a policy statement. The Task Force categorized and annotated these issues as follows:

1. Legal Status

Should each free-standing American institution abroad have a legal identity which parallels that of its Stateside counterpart? If so, what would be the relationship between the Stateside and foreign entities?

2. Finances

The monitoring of institutional finances can be complex, since these may be incurred in the currency of the host country but translated into U.S. dollars on financial statements. However, many institutions now deal with different currencies routinely in operating study abroad programs, branch campuses, and other international endeavors and there are standard accounting practices that address these issues quite well.

Students may not have access to a full range of financial support sponsored through federal student assistance programs.

3. Curriculum

Should some (prudent) flexibility of standards and criteria be allowed so that free-standing institutions abroad can offer a curriculum which is purposefully international in content and cross-cultural in perspective?

4. Enrollment

The presence of American students at free-standing institutions abroad should not be seen as a critical requisite for accreditation. A more central issue should be comparability of the curriculum, i.e., that the institution offers an American college education comparable to that offered in the U.S.

5. Faculty

Free-standing institutions tend to hire nationals of the host country because of work permit restrictions or because the international curriculum makes it desirable or even

necessary to do so. Thus, it will be important that faculty have an understanding of American education through training (U.S. degrees) or experience and that there be a sufficient number of American faculty in leadership positions.

6. Mission

By virtue of the issues raised above, it seems appropriate that free-standing institutions abroad be prepared to review and revise their mission statements at frequent intervals.

The Commission on Higher Education acted in June 1994 to continue its moratorium on applications from free-standing American colleges abroad. However, it called on its executive director to carry these proposals and analyses to the National Policy Board for early consideration. The important questions raised will be postponed only if the regionals continue old approaches. A lasting solution can only come with a national approach to accreditation issues in international education.

New and Revised Policies

During 1994–95, the Commission's policy development agenda will include new and revised policies on institutional change, graduate education, and assessment.

Institutional Change

Even though the Commission has a number of policy and procedural statements concerning substantive change, it needs a single, coherent, and comprehensive policy statement on overall institutional change. In addition to reducing duplication of effort as well as confusion for institutions in dealing with the preparation and submission of required information related to institutional change, the new policy statement and procedural guidelines would simplify and streamline both the information required and the decision making process related to changes in institutions.

Graduate Education

As for graduate education, the Commission has not made significant changes in the graduate study policy for a number of years and the current policy statement is not entirely consistent with some of the language about graduate education in the recently adopted *Characteristics of Excellence in Higher Education*. It is anticipated that a task force will be appointed during the coming year to address a number of continuing and emerging issues in the area of graduate education.

Assessment

Early in 1994, the Commission appointed an Assessment Advisory Committee, which has already begun to review *Framework for Outcomes Assessment*, develop a new policy statement on assessment, and conduct a comprehensive survey of the constituency on the state of the art in assessing student learning outcomes and institutional effectiveness in the Middle States region. The first draft of the Committee's work will be ready for an initial review by the Commission in 1995.

Liaison with External Organizations, Agencies, and Groups

Aside from my usual interactions with state higher education agencies, other accrediting bodies and higher education groups, the Commission and its staff have been engaged intensely in discussions with the National Policy Board on Higher Education Institution Accreditation (NPB) about the future of accreditation and quality assurance in the United States.

Through the medium of the *CHE Letter*, you probably recall the dissolution of the Council on Postsecondary Accreditation (COPA) in December 1994; COPA served for many years as the umbrella organization for accreditation. However, because the regional accrediting commissions experienced increasing frustration in getting COPA to address some of the substantive issues on its agenda in relation to the financial commitment the regionals had made, leaders of the regionals petitioned the Board of Directors of COPA to dissolve the organization if appropriate changes could not be made. Thus, as a result of the demise of COPA, the NPB was founded as a temporary organization to fill the void.

The group's initial charge was to address problems inherent in the reauthorization of the Higher Education Act Amendments of 1992 and their implementing regulations, as well as to address some of the issues already identified by the regionals (e.g., common eligibility criteria and core standards, common policies and procedures, and stronger public disclosure policies). In addition, the NPB seized the opportunity to create a new voice for accreditation at the national level.

As a member of the National Policy Board, I participated in innumerable sessions dealing with contemplated changes in the nature, structure, and governance for institutional accreditation. Those proposals already are being debated within the Commission, and reactions from constituent members will be gathered during 1994–95.

No less important were the Commission's interactions with the U. S. Department of Education (USDE) about the Commission's own compliance with the new provisions of the regulations implementing the reauthorization of the Higher Education Act Amendments, especially about the timing of the development and submission of the next petition for recognition by the Department's National Advisory Committee on Institutional Quality and Integrity (NACIQI).

The Commission previously was slated for a review of its new petition in 1996. However, as a result of some USDE staff decisions, the Department rescheduled the Commission for a 1995 petition review instead. Fortunately, through appropriate consultation with the Department early in 1995, the Commission's petition review schedule was restored to 1996. As a prelude to preparing the new petition, the Commission will launch a comprehensive study of the future of accreditation in the Middle States region.

Workshops, Conferences, and Other Special Events

The Commission successfully organized several workshops and conferences during 1993–94 and planned sessions in other areas that have the potential for improving undergraduate education. However, the most important series of special events celebrated the 75th anniversary of the Commission.

The 75th Anniversary

A Planning Committee, representing various constituents, assisted staff in developing plans to celebrate the 75th anniversary of the Commission. During 1993–94 and 1994–95, a number of regional celebrations were hosted by colleges and universities in the region. An academic convocation was planned for December 1995 to culminate the year-long celebrations. A Collegiate Poster Competition yielded numerous entries from talented students in the region, and the winning entry was chosen for reproduction as a poster and as the cover of a commemorative book which included the program for the convocation.

In-Service Workshops

Staff organized the Commission's regularly scheduled workshops, which were led by either volunteer or staff facilitators and panelists. Some of these in-service workshops were designed to enable institutional representatives to participate more effectively in their institution's scheduled self-study. Other sessions prepared evaluation team members and chairs for their various roles in the peer review process.

In December of 1995, the Commission will sponsor its first annual conference, in part replacing the Annual Meeting of the Middle States Association, which has been discontinued. This conference will incorporate many of the regular workshops scheduled in previous years. There also will be a residential Self-Study Institute, replacing the usual one-day Self-Study Workshop; an entirely new series of forums on issues of perennial and current interest to constituents; special training sessions that will provide reviewers and financial analysts with strategies for evaluating periodic review reports from accredited institutions; and sessions in collaboration with other organizations. Also during 1995, the Commission will collaborate with a number of organizations to cosponsor a series of roundtables that will explore issues in information literacy.

Commission on Higher Education

Middle States Association of Colleges and Schools

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